

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NORTH DAKOTA

In re:	)	Case No. 25-30002
	)	(Chapter 11)
GENERATIONS ON 1ST, LLC	)	
	)	
Debtor	)	
	)	
	)	Case No. 25-30003
In re:	)	(Chapter 11)
	)	
PARKSIDE PLACE, LLC	)	Jointly Administered
	)	
Debtor	)	
	)	
	)	Adv. Case No. 25-07009
GENERATIONS ON 1ST, LLC, <i>et al.</i>	)	
	)	
Plaintiffs	)	
	)	
v.	)	
	)	
RED RIVER STATE BANK	)	
	)	
Defendant	)	
	)	

**JOINT MOTION TO EXTEND TIME**

Come now the plaintiffs and defendant herein, by and through respective undersigned counsel, pursuant to Federal Rule of Bankruptcy Procedure 9006(b)(1)(A), and move to extend the deadline to stipulate to certain facts, as established in this Honorable Court's order of July 11, 2025 (the "Order," as found at DE #18), and in support thereof state as follows:

The parties have been working—and continue to work—amicably toward forming a stipulation of facts that "relate solely to the question of which state law applies to causes of action for deceit and fraud in this case," Order, DE #18, at p. 23, and are nearing completion of the same. However, as a Friday afternoon ticks closer to a Friday evening, there is a belief that such may be

more efficiently and cleanly completed on the ensuing business day. And there is, too, a general agreement that the stipulation is likely to be in a better form if aided by one additional business day of preparation time.

The parties do not seek an extension for purposes of delay (and, to be sure, do not believe any meaningful delay will be occasioned by an extension of one business day). Nor is the extension sought for any improper, underhanded, or pretextual purpose. This is something on which counsel for both sides have been cooperatively working since shortly after the Order was docketed and is merely a task upon which they wish to have an added business day.

WHEREFORE, the plaintiffs and defendant respectfully pray this Honorable Court extend the deadline to submit a stipulation of facts, to and through Monday, August 4, 2025, and for such other and further relief as may be just and proper.

**The Dakota Bankruptcy Firm**

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Counsel for the Defendant

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 1st day of August, 2025, a copy of the foregoing was served electronically upon filing via the ECF system.

/s/ Maurice B. VerStandig  
Maurice B. VerStandig